respective gradients. It does not disclose, however, that these gradients are based upon data from the image being processed.

More particularly, with reference to Figure 1 of the patent, and column 7, lines 47-50, the output data from a partial sum calculator 510 is applied to three coefficient multipliers 600, 630 and 670. In other words, these three coefficient multipliers each process the image data, in parallel. Each coefficient multiplier has a different set of coefficients that are applied to the image data. Figures 7A, 7B and 7C illustrate three examples of coefficients that might be employed in the respective coefficient multipliers. The *Murakami* patent states that these three sets of coefficients "have different coefficient gradients in the vicinity of a target pixel." As is conventional in the type of image processing to which the *Murakami* patent relates, the target pixel, i.e., the pixel currently being processed, is associated with the center of the coefficient matrix. Referring to Figure 5 of the *Murakami* patent, the target pixel is identified by the letter "A" (col. 7, lines 34-35). The above-quoted passage from column 7 is stating that each of the three matrices illustrated respectively in Figures 7A, 7B and 7C has a different gradient, relative to this target pixel. The example of Figure 7A has the sharpest gradient, which varies over a range of 16 to 1 from the center to the outer periphery of the matrix. The example of Figure 7C has a flat gradient, where all coefficients are equal to one another. The example of Figure 7B is intermediate the two extremes of Figure 7A and 7C.

The *Murakami* patent does not disclose, nor otherwise suggest, that any of these values are selected on the basis of data from the image being processed. In particular, the reference to a "target pixel" does not mean that the *value* of a particular pixel in the image is used to select the coefficient. Rather, the term "target pixel" in the above-quoted passage refers to a *location* within the matrix, i.e. the center cell. As stated at column 7, lines 50-51, these coefficient values are predetermined. In other words, the same respective sets of coefficients are employed by the three coefficient multipliers 600, 630 and 670 for *each* of the pixels in the image being processed. They are not *selected* on the basis of image data.

Accordingly, it is respectfully submitted that the *Murakami* patent does not anticipate claims 2-4, 16 and 19, since it does not disclose every element recited in these claims. At a minimum, it does not disclose the step of deriving, for each pixel

of a neighborhood, a significance coefficient "that is based upon the value of that pixel", as recited in independent claims 2 and 16. Since the coefficients of the *Murakami* patent are predetermined, they cannot be derived on the basis of the value of a pixel in an image.

In view of the foregoing, it is respectfully submitted that all pending claims are patentably distinct from the *Murakami* reference, whether considered by itself or in combination with the other cited references. Reconsideration and withdrawal of the rejections of claims 2-9, 11, 12, 16 and 19, and allowance of all pending claims is respectfully requested.

Respectfully submitted,

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